

Pharmaceuticals and Sharps Collection and Disposal

**Presentation to the Los Angeles County
Board of Supervisors, November 1, 2016**

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Background: Board Actions

- Resolution supporting EPR (11/5/08)
- Investigate feasibility of Ordinance (6/2/15)
- Draft Extended Producer Responsibility (EPR) Ordinance (8/11/15)
- Expedited implementation of more immediate options (5/17/16)



June 14 Motion: “Option 1”

Work with the stakeholders to:

- Launch a public education and outreach campaign
- Implement take-back event days
- Measure effectiveness of activities
- Assess Walgreens’ 24-hour kiosks
- Provide a final report on Nov. 1



Collaboration with Industry



Highlights:

- Discussion
- Identified take-back locations
- Plan submission and review
- Revised plan submitted



Review of Industry's Proposal

- Received revised proposal on Aug. 12
- Provided Plan Correction Sheets
- Did components **meet, partially meet, or did not meet** requirements?



Board Requirements Not Met - Plans Not Approved

- In-home disposal messaging
- Relied on Sheriff's Dept for take-back events
- Did not focus on unincorporated communities
- Lacked specific details to allow thorough evaluation of plans



Grant Offer to Sheriff's Department

- \$200,000 grant offered to Sheriff's Dept. to host and run take-back events
- Industry asked to provide alternate proposals
- Grant offered again in Proposal #2
- Grant offer declined



Industry's Response to County's Plan Correction Sheets

- No response to DPH's Corrective Action Letter
- No revised plans submitted by Industry
- Industry 9/16/16 letter to each Board Office:
 - Launching MyOldMedsLA Campaign
 - Cannot comply with motion unless the Sheriff's Dept. hosts and operates take back events
 - Claimed EPR Working Group was unwilling to work with Industry



Oct. 12 Health and Mental Health Services Cluster Meeting

County Requested Industry to provide:

- Outreach messaging and media materials
- Study/survey conducted by industry
- Position on implementing take-back events through a contractor
- Timeline for implementation

Outcomes and Responses

- October 10: Industry launched MyOldMedsLA campaign
- October 18: Industry sent letter to BOS and EPR Working Group
- October 24: EPR Working Group emailed a response to Industry

MyOldMedsLA Campaign

No additional options for the public

Promotes existing (County-sponsored) programs

Promotes in-home disposal

Campaign not targeted to unincorporated communities



DEA Regulations Allow for Take Back Options

§1301.51 Modification in registration.

(b) “**Any** manufacturer, distributor, reverse distributor, ... or retail pharmacy” may apply to become a collector.

§1317.65 Take-back events.

(a) Federal, State, tribal, or local law enforcement may conduct a take-back event ...**Any person** may partner with law enforcement to hold a collection take-back event in accordance with this section.

Walgreens

- LA County: 749 lbs collected through July
- Nationally: 10 tons collected through October
- Follows best practices
- Walgreens willing to collaborate with County



Findings

- Board guidance for Education and Outreach Campaign and Quarterly Take-Back Events was not followed
- Unable to establish benchmarks or evaluate effectiveness
- Concerns with MyOldMedsLA campaign
- Walgreens program can allow for continued collaboration

Recommendation

Goal: Safe, convenient and sustainable options for disposal of pharmaceutical and sharp waste

- EPR-based regulatory solution may be the optimal approach to achieving this goal

